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Attorney for Defendant Mukesh Patel

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON

MALBCO HOLDINGS, LLC, a  
Washington limited liability company,

Plaintiff,

v.

BUHPENDRA R. PATEL, and NEELA B.  
PATEL, husband and wife; HEETAN B.  
PATEL, HEETAL B. PATEL-MANINI;  
and MUKESH PATEL,

Defendant.

Case No. 3:14-cv-947

DEFENDANT MUKESH PATEL'S  
REPLY IN SUPPORT OF DEFENDANT'S  
MOTION TO DISMISS PLAINTIFF'S  
CLAIM FOR ATTORNEY FEES AND  
PUNITIVE DAMAGES IN SECOND  
AMENDED COMPLAINT

**ORAL ARGUMENT REQUESTED**

For his reply in support of his Motion to Dismiss Malbco's Claim for Attorney Fees and  
Punitive Damages in Second Amended Complaint (Docket No. 130), Defendant Mukesh Patel  
joins and adopts the arguments set forth in the Reply in Support of Defendants Heetan and

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Heetal Patel's Motion to Dismiss Malbco's Claim for Attorney Fees and Punitive Damages in Second Amended Complaint (filed this same day) as if fully set forth in this Reply.

DATED this 23<sup>rd</sup> day of June, 2016.

MOTSCHENBACHER & BLATTNER LLP

By: /s/ Nicholas J. Henderson  
Nicholas J. Henderson, OSB No. 074027  
Of Attorneys for Defendant Mukesh Patel

### **CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing DEFENDANT MUKESH PATEL'S REPLY IN SUPPORT OF DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S CLAIM FOR ATTORNEY FEES AND PUNITIVE DAMAGES IN SECOND AMENDED COMPLAINT on:

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☒ Via First Class Mail

☐ Via Facsimile

☐ Via Hand Delivery

☐ Via Electronic Mail

☒ Via CM/ECF Electronic Notification

DATED this 23<sup>rd</sup> day of June, 2016.

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